



**PHYSICIAN ASSISTANT COMMITTEE
MEDICAL BOARD OF CALIFORNIA**

1424 Howe Avenue, Suite 35, Sacramento, CA 95825-3237
Telephone: (916) 263-2670 (800) 555-8038 FAX: (916) 263-2671
CALIFORNIA RELAY SERVICE BY TDD: 1-800-735-2929
E-mail: pacommittee@medbd.ca.gov
Web site: www.physicianassistant.ca.gov



DRUG ORDERS by PHYSICIAN ASSISTANTS

Effective January 1, 2000, Senate Bill 816 by Senator Escutia (Chapter 749, Statutes 1999) in part amended the Physician Assistant Practice Act (Business and Professions Code, Section 3502.1), several provisions of the California Pharmacy Law, and several provisions of the Health and Safety Code. Two effects of these changes are to qualify a physician assistant (PA) to obtain a federal Drug Enforcement Agency (DEA) controlled substances registration number, and to authorize a PA to write and sign prescription "drug orders" when authorized to do so by a supervising physician. The Pharmacy Law amendments, in part, authorize pharmacists to dispense drugs or devices, including controlled drugs, based on a PA's written drug order. SB 816 was sponsored by the California Academy of Physician Assistants (CAPA), and supported by the Physician Assistant Committee and other organizations.

The following describes the primary provisions of the SB 816 that relate to physician assistants (PAs):

1. Drugs Orders

Newly amended Section 3502.1 of the Business and Professions Code permits physicians to grant authority to PAs to issue written "drug orders" for medication and medical devices that can be filled by pharmacists, and deletes former references to "prescription transmittal orders". When transmitting a supervising physician's prescription via a drug order, "the physician assistant is acting on behalf of and as an agent for a supervising physician and surgeon." A "drug order" means an order for medication which is dispensed to or for a patient and the order is issued and signed by a PA.

Any prescription transmitted or carried out by a PA, whether by dispensing prepackaged drugs or with an oral or written drug order, is subject to a reasonable quantitative limitation consistent with customary medical practice in the supervising physician's practice.

Basis for Drug Order

The physician's prescription when transmitted by a PA, or issued as a drug order by the PA, for any patient cared for by the PA, must be based *either* on a written, practice specific formulary and protocols adopted by the supervising physician, or shall be approved by the supervising physician before it is filled or carried out.

A drug order for drugs not listed in the practice's protocols and formulary may only be issued by the PA with advance authorization from the supervising physician for the specific patient. (A record of the physician's oral authorization for a drug order should be entered into the patient's medical record by the PA.)

A physician assistant may only administer, provide or transmit a drug order for Schedule II through Schedule V controlled substances with the advance approval by supervising physician for the specific patient.

2. Form

A "drug order" issued by a PA must contain "the printed name, address, and telephone number of the supervising physician and surgeon, the printed or stamped name and license number of the physician assistant, and the signature of the physician assistant." It must also contain the physician assistant's federal controlled substances registration number (i.e., DEA number) if the drug order is for a controlled substance (i.e., schedule drugs). These requirements "may be met through stamping or otherwise imprinting on the supervising physician and surgeon's prescription blank to show the name, license number, and if applicable, the federal controlled substances number of the physician assistant, and shall be signed by the physician assistant."

The physician's signature is not required on the physician assistant's drug order. However, the written drug order must be signed by the PA. As with all tasks delegated to a PA, the supervising physician may limit the PAs authority to issue oral, electronic, or written drug orders as the supervising physician deems appropriate.

3. DEA Number

Every physician assistant who is authorized by a supervising physician to issue drug orders for controlled substances must register with the United States Drug Enforcement Administration (DEA). Telephone numbers for DEA offices are as follows:

San Francisco Field Division	888-304-3251
Los Angeles Field Division	888-415-9822 or 213-621-6960
San Diego Field Division	858-616-4542
Website:	www.deadiversion.usdoj.gov

4. Physician Supervision

A supervising physician and surgeon who delegates authority to issue drug orders to a physician assistant may limit this authority by specifying the manner in which the physician assistant may issue the drug order.

Protocol and Formulary

Each supervising physician and surgeon who delegates the authority to a physician assistant to issue a drug order shall first prepare and adopt a written, practice specific, formulary and protocols that specify all criteria for use of a particular drug or device, and any contraindications for this selection. The drugs listed shall constitute the formulary and shall include only drugs that are appropriate for use in the type of practice engaged in by the supervising physician and surgeon. (Protocols adopted by the supervising physician and surgeon may incorporate by reference specific portions of particular editions of texts, and other sources.)

Medical Record

The medical record of any patient cared for by a PA for whom the supervising physician's prescription has been transmitted or carried out, or a drug order was issued by a PA, must be reviewed, countersigned, and dated by a supervising physician and surgeon within seven (7) days.

5. Prepackaged Medications

A physician assistant acting at the direction of a supervising physician may hand to a patient of the supervising physician a properly labeled prescription drug prepackaged by a physician, a manufacturer as defined in the Pharmacy Law, or a pharmacist.

6. Relating to Pharmacists

California Pharmacy Law, in part, now authorizes a licensed pharmacist to dispense drugs or devices upon receipt of a written drug order signed by a PA. A drug order issued by a PA for a controlled drug must now contain the physician assistant's DEA number.

7. Triplicate Scripts

Triplicate scripts are required by any health care provider who desires to transmit a written drug order or prescription for a Schedule II drug. Pharmacists will not honor prescriptions for Schedule II drugs without a triplicate script completely filled out by hand and signed by an individual who possesses a valid DEA number. A PA may obtain triplicate scripts if authorized in writing in a delegation of services agreement developed by their supervising physician and if Schedule II drugs are used in the supervising physician's usual and customary medical practice.

Triplicate scripts and additional information regarding the program can be requested by contacting the Bureau of Narcotic Enforcement of the Department of Justice at 916-227-4051. A copy of the applicant's current DEA certificate and a fee will be required to obtain the initial supply of triplicate scripts.

For additional information on the requirements for a pharmacist/pharmacy to accept prescriptions in various formats (e.g., telephonic/electronic) including written drugs orders, individuals may contact the Board of Pharmacy at (916) 324-2302.

Note: This document does not purport to be an exhaustive analysis of laws relating to drug orders. This is not a declaratory opinion of the Physician Assistant Committee (PAC). Questions about this document may be addressed to the PAC's executive officer at the address above.